

**IN THE HAMILTON COUNTY CHANCERY COURT  
FOR THE ELEVENTH JUDICIAL DISTRICT AT CHATTANOOGA**

**TERPSEHORE MARAS,**

**Plaintiff,**

**v.**

**CHATTANOOGA NEWS CHRONICLE,  
THEHUFFINGTONPOST, INC.,  
REPRESENTATIVE STEVE COHEN, US  
DOMINION, INC., DOMINION VOTING  
SYSTEMS, INC., DOMINION VOTING  
SYSTEMS CORPORATION, MEDIA  
MATTERS FOR AMERICA, OHIO  
INTELLIGENCE TIPS, ROSS ELDER,  
and ALI ABDUL RAZAQ AKBAR a/k/a  
ALI ALEXANDER,**

**Defendants.**

**Civil Action No. : 21C1017**

**JURY DEMAND**

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**MOTION FOR SHOW CAUSE HEARING**

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COMES NOW Plaintiff Terpsehore Maras and, pursuant to Tenn. R. Civ. P. 45.06, hereby moves this Honorable Court for an Order and a hearing for the United States District Court, Northern District of Georgia, Atlanta Division, to show cause as why it should not be held in contempt of court for its “disobedience or … refusal to be sworn or to answer as a witness …” in response to the subpoena issued by this Honorable Court and domesticated in the Fulton County Superior Court. Tenn. R. Civ. P. 45.06. As grounds for said motion, Plaintiff shows the Court the following:

1. On October 29, 2021, Plaintiff Terpsehore Maras filed a Verified Complaint in the Hamilton County Circuit Court for defamation of character. (Certificate of Non-Appearance, dated November 19, 2021, p. 4.12-13).

2. At the same time that the Verified Complaint was filed, the Hamilton County Circuit Court issued a Subpoena to The United States District Court, For the Northern District of Georgia, Atlanta Division to produce certain documents. *Id* at 4.13-15; Exhibit 1 to Certificate of Non-Appearance.

IN THE CIRCUIT COURT FOR HAMILTON COUNTY, TENNESSEE	SUBPOENA TENN. R. CIV. PRO. 45	CASE FILE NUMBER 21C1017
TO: (name, address & telephone number of witness) THE UNITED STATES DISTRICT COURT, FOR THE NORTHERN DISTRICT OF GEORGIA ATLANTA DIVISION, RICHARD B. RUSSELL FEDERAL BUILDING 221 U.UNITED STATES COURTHOUSE, 75 TRID TURNER DRIVE ATLANTA, GA 30303-3309	PLAINTIFF(S) TERPSHORE MARAS	DEFENDANT(S) CHATTANOOGA NEWS CHRONICLE ET AL

3. The “Subpoena for Production of Documentary Evidence” was issued pursuant to Tenn. R. Civ. P. 45.02 and it Order The United States District Court, Northern District of Georgia, Atlanta Division to do as follows: “You are hereby commanded to produce and permit inspection and copying of designated items (books, papers, documents, or tangible things...) at the time, date, and place specified herein. **Your personal appearance is not required provided you sign a notarized affidavit that the books, papers, documents, or tangible things are authentic to the best of your knowledge, information, and belief and state whether or not all books, papers, documents, or tangible things responsive to this subpoena have been produced for copying or inspection.** Copies of this subpoena have been duly served pursuant to Rule 5 on all parties, and all material produced will be made available for inspection or copying by all parties.” Exhibit 1 to Certificate of Non-Appearance.

(404) 215-1600	✓ SUBPOENA FOR PRODUCTION OF DOCUMENTARY EVIDENCE, TENN.R.CIV.PRO. 45.02
You are hereby commanded to produce and permit inspection and copying of designated items (books, papers, documents, or tangible things, or inspection of premises) at the time, date, and place specified herein. <b>Your personal appearance is not required provided you sign a notarized affidavit that the books, papers, documents, or tangible things are authentic to the best of your knowledge, information, and belief and state whether or not all books, papers, documents, or tangible things responsive to this subpoena have been produced for copying or inspection.</b> Copies of this subpoena have been duly served pursuant to Rule 5 on all parties, and all material produced will be made available for inspection or copying by all parties.	
RECEIVED ON TRIAL TENN.R.CIV.PRO.45.05	

4. Said Subpoena required The United States District Court, Northern District of Georgia, Atlanta Division to produce the Designated Items: "All documents, reports, e-mails and/or other documents relating to J. Alex Halderman and The Halderman Report filed under seal. *Id.*

**DESIGNATED ITEMS:**

All documents, reports, e-mails and/or other documents relating to J. Alex Halderman and The Halderman Report filed under seal.

5. Since the entity being sent a Hamilton County Circuit Court Subpoena was domiciled in Georgia, the Official Code of Georgia required the Hamilton County Subpoena to be domesticated in the County in which the subpoenaed entity was domiciled. O.C.G.A. § 24-13-112(a).

[< Previous](#)

[Next >](#)

**O.C.G.A. § 24-13-112**

[Copy Citation](#)

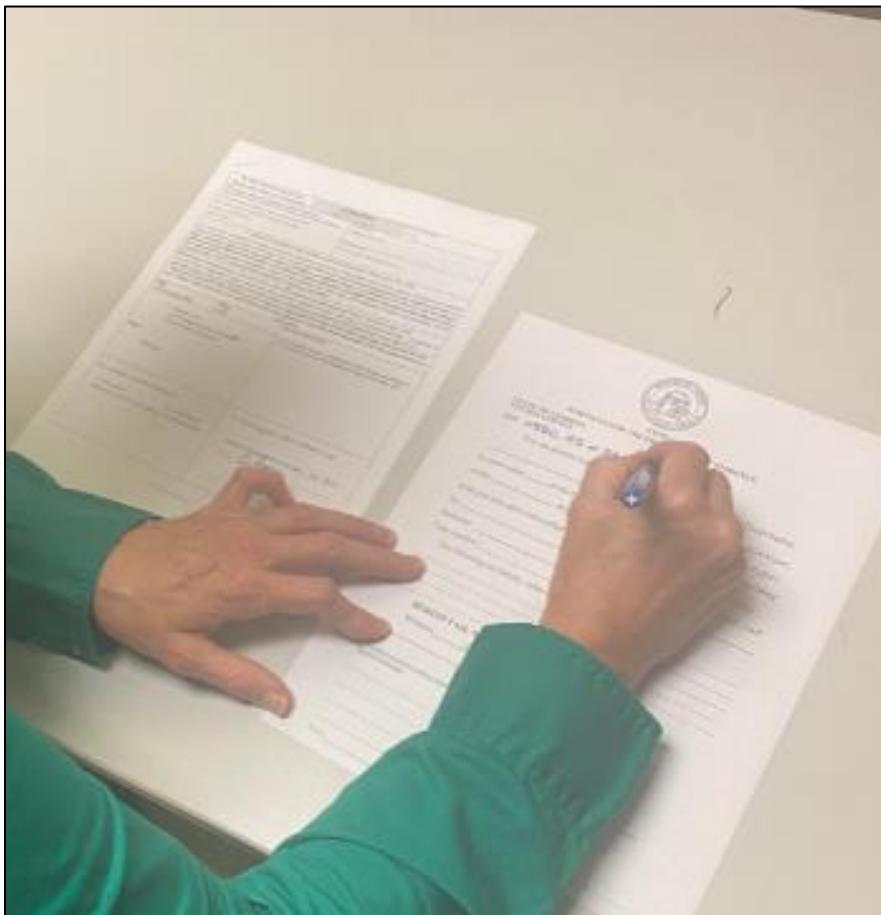
Current through the 2021 Regular Session of the General Assembly.

[GA - Official Code of Georgia Annotated](#) > [TITLE 24. EVIDENCE](#) > [CHAPTER 13. SECURING ATTENDANCE OF WITNESSES AND PRODUCTION AND PRESERVATION OF EVIDENCE](#) > [ARTICLE 5. UNIFORM INTERSTATE DEPOSITIONS AND DISCOVERY ACT](#)

**§ 24-13-112. Requirements for issuance of foreign subpoenas; application**

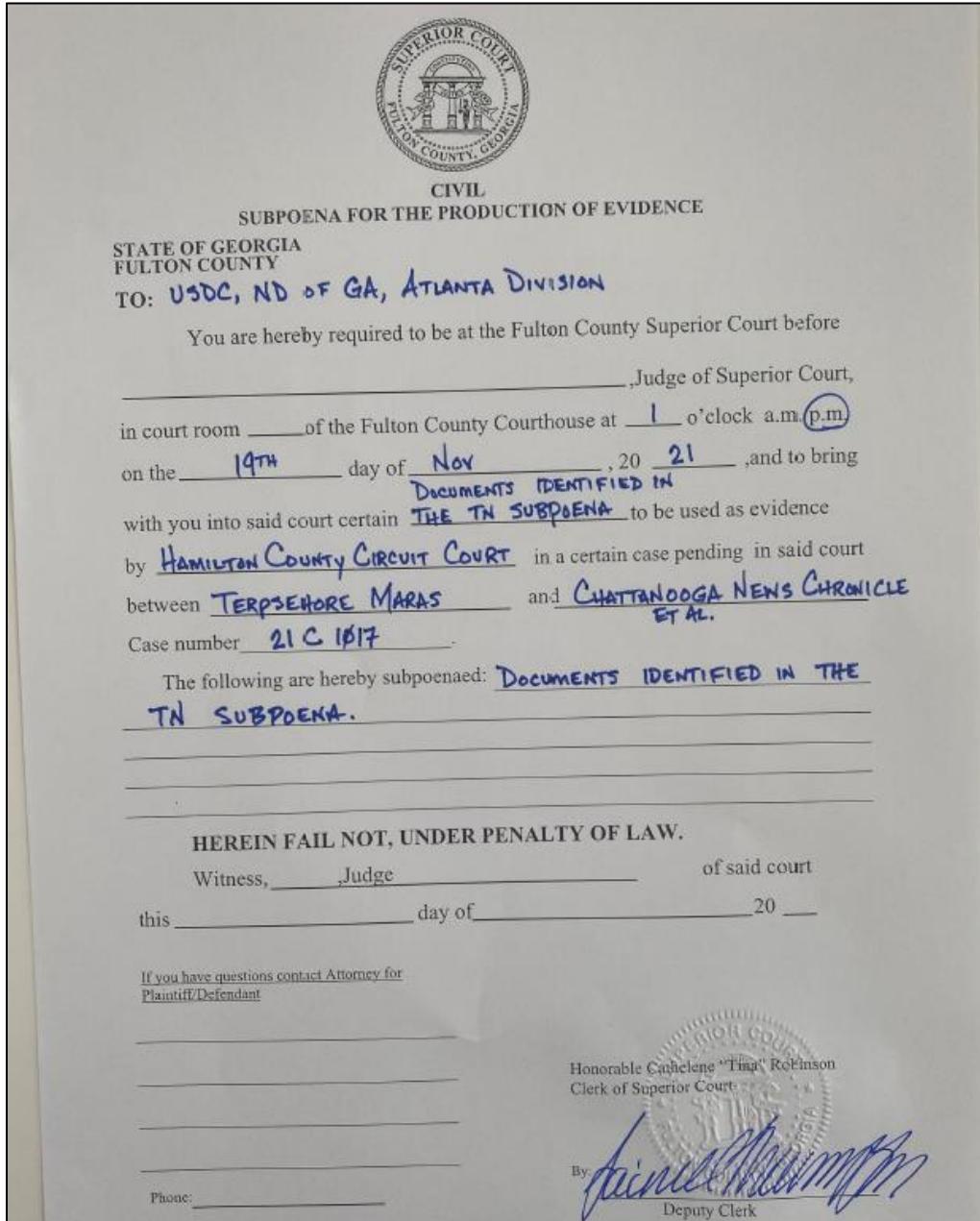
**(a)** To request issuance of a subpoena under this Code section, a party shall submit a foreign subpoena to the clerk of superior court of the county in which the person receiving the subpoena resides. A request for the issuance of a subpoena under this Code section shall not constitute an appearance in the courts of this state.

6. Therefore, on the same day that the subpoena was issued, Plaintiff delivered the Hamilton County Circuit Court Subpoena to the Fulton County Superior Court and domesticated said Subpoena in the Fulton County Superior Court. *Id* at p. 5.



7. On November 19, 2021, the Fulton County Superior Court issued a Subpoena for The United States District Court, Northern District of Georgia, Atlanta Division to appear at "the Fulton County Courthouse a 1 o'clock p.m. on the 19th day of Nov, 2021 and to bring with you into said court certain documents identified in the TN Subpoena to be used as evidence by the Hamilton County Circuit Court in a certain case pending in said court between Terpsehore Maras and Chattanooga

News Chronicle et al. Case No. 21C1017. The following are hereby subpoenaed: Documents identified in the TN Subpoena." (Certificate of Non-Appearance, Exhibit 2).



8. The same day, on October 29, 2021, Plaintiff had the domesticated Hamilton County Circuit Court subpoena and the Fulton County Superior Court Subpoena hand-delivered on Judge Amy Totenberg's law clerk. (Certificate of Non-Appearance, p. 5).

9. "Pursuant to Tenn. R. Civ. P. 45.07(1), a party or attorney responsible for issuing and serving a subpoena shall provide the non-party witness at least twenty-one (21) days after to service of the subpoena to respond, absent agreement of the non-party witness or a court order." *Id.*

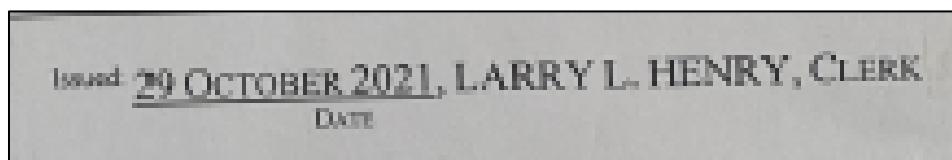
material produced will be made available for inspection or copying by all parties.

SUBPOENA FOR DEPOSITION, TENN.R.CIV.PRO. 45.04     SUBPOENA FOR HEARING OR TRIAL, TENN.R.CIV.PRO. 45.05

You are hereby commanded to appear at the time, date, and place specified herein for the purpose of giving testimony. In addition, if indicated, you are to bring the designated items listed. Failure to appear may be punished by fine/imprisonment as provided by law.

Tenn. R. Civ. Pro. 45.07(1) a party or attorney responsible for issuing and serving a subpoena shall provide the non-party witness at least twenty-one (21) days after to service of the subpoena to respond, absent agreement of the non-party witness or a court order."

10. The Subpoena was issued on 29 October 2021. (Certificate of Non-Appearance, Exhibit 1).



11. The Subpoena was signed and issued by a Hamilton County Circuit Court Deputy Clerk on 29 October 2021. *Id.*



12. Pursuant to Tenn. R. Civ. P. 45.07(1), "A party or attorney responsible for issuing and serving a subpoena must take reasonable steps to avoid imposing undue burden or expense on a non-party witness subject to the subpoena and shall provide the non-party witness at least twenty-one (21) days after service of the subpoena to respond, absent agreement of the non-party witness or a court order." (emphasis added).

13. Therefore, the deadline to object **to any** alleged deficiencies and/or problems with the subpoena or to objection to production of any of the Designated Items was **November 19, 2021.**

**Start Date**

Month: Day: Year: Date:  
10 / 29 / 2021 

Add/Subtract: Years: Months: Weeks: Days:  
     21

Today  
Include the time  
 Repeat

From Friday, October 29, 2021  
Added 21 days

**Result: Friday, November 19, 2021**

14. On Wednesday November 17, 2021, Kevin P. Weimer, District Court Executive / Clerk of Court for The United States District Court, Northern District of Georgia wrote an e-mail stating the court's intent to ignore the subpoena: "the Northern District of Georgia does not intend to respond to the subpoena from the Superior Court of Fulton County pertaining to the case between Terpsehore Maras and Chattanooga News Chronicle." (Certificate of Non-Appearance, Exhibit 4).

**Subpoena from the Superior Court of Fulton County**   

 **Kevin Weimer** <Kevin\_Weimer@gand.uscourts.gov>  
to me ▾ Nov 17, 2021, 4:13 PM   

Good afternoon, Mr. Newman. As I mentioned to you on the phone, the U.S. District Court for the Northern District of Georgia does not intend to respond to the subpoena from the Superior Court of Fulton County pertaining to the case between Terpsehore Maras and Chattanooga News Chronicle.

Regards,

Kevin P. Weimer

---

 KEVIN P. WEIMER  
DISTRICT COURT EXECUTIVE / CLERK OF COURT  
United States District Court  
Northern District of Georgia  
75 Ted Turner Drive, SW  
Atlanta, GA 30303  
404-215-1610

15. In response to The United States District Court Clerk's, at 11:39 AM on Friday November 19, 2021, undersigned counsel wrote back to the usdc Clerk as follows: "Please meet me in the Fulton County Clerk's office so that we can be assigned a conference room for this deposition. I am running a few minutes late, but I will be there shortly after 1 pm. See you soon, Russell A. Newman ...." *Id.*

Re: Subpoena from the Superior Court of Fulton County

Russell Newman <russell@thenewmanlawfirm.com>  
to Kevin,

Fri, Nov 19, 11:39 AM ☆ ↵ :

Good afternoon, Mr. Weimer.

Please meet me in the Fulton County Superior Court Clerk's office so that we can be assigned a conference room for this deposition. I am running a few minutes late, but I will be there shortly after 1 pm.

See you soon,

Russell A. Newman, Esq.  
The Newman Law Firm  
6688 Nolensville Road  
Suite 108-22  
Brentwood, TN 37027  
T: (615) 554-1510  
F: (615) 283-3529  
Email: [russell@thenewmanlawfirm.com](mailto:russell@thenewmanlawfirm.com)  
<https://www.thenewmanlawfirm.com/>

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16. Pursuant to Tenn. R. Civ. P. 45.07(2), "A non-party witness commanded to give deposition testimony or to produce documents or tangible things or to permit inspection shall serve on the party or attorney designated in the subpoena a written objection, if any, to having to give testimony or to inspecting, copying, testing or sampling any or all of the materials or to inspecting

the premises, or to producing electronically stored information in the form or forms requested. Such objection must be served on the party or attorney designated in the subpoena within twenty-one days after the subpoena is served." (emphasis added).

17. Pursuant to Tenn. R. Civ. P. 54.07(4), "The timely service of an objection obviates the need for compliance with the deposition subpoena pending further order of the court." (emphasis added).

18. An "objection" is defined as follows: "A formal statement opposing something that has occurred, or is about to occur, in court and seeking the judge's immediate ruling on the point." Black's Law Dictionary, Abridged Eighth Edition, p. 905 (emphasis added).

**objection**, *n.* **1.** A formal statement opposing something that has occurred, or is about to occur, in court and seeking the judge's immediate ruling on the point. • The party objecting must usu. state the basis for the objection to preserve the right to appeal an adverse ruling.

19. "Object" is defined by Black's Law Dictionary as follows: "To state in opposition; to put forward as an objection ...." *Id* (emphasis added).

**object** (əb-jekt), *vb.* **1.** To state in opposition; to put forward as an objection <the prosecution objected that the defendant's discovery requests were untimely>. **2.** To state or put forward an objection, esp. to something in a judicial proceeding <the defense objected to the testimony on the ground that it was privileged>. — **objection**, *n.*

20. The United States District Court, Northern District of Georgia, Atlanta Division did not object in writing to having to show up to its deposition or to producing the Designated Items.

21. Instead of objecting (*i.e.*, items are not relevant, production is unduly burdensome, items exceed the scope of discovery, subpoena was not properly domesticated, *etc.*), The United States District Court, Northern District of Georgia, Atlanta Division stated its intent to ignore the subpoena and to snub this Court's authority.

22. The potential for The United States District Court, Northern District of Georgia, Atlanta Division's to snub this Court's authority was actualized when The United States District Court, Northern District of Georgia, Atlanta Division did not object in writing and when it failed/refused to show up to its deposition.

23. To date, The United States District Court, Northern District of Georgia, Atlanta Division has still not objected in writing to complying with said Subpoenas.

24. Pursuant to Tenn. R. Civ. P. 45.07(4), "**The failure to serve an objection** within the time period specified herein **waives all objections to the subpoena....**" (emphasis added).

(4) The Court may: (1) grant the motion to compel testimony or production or inspection, or modify the subpoena if it is unreasonable and oppressive; or (2) condition the grant of the motion upon the advancement by the person in whose behalf the subpoena is issued of the reasonable costs of producing the books, papers, documents, electronically stored information, or tangible things. The timely service of an objection obviates the need for compliance with the deposition subpoena pending further order of the court. **The failure to serve an objection within the time period specified herein waives all objections to the subpoena** except the right to seek the reasonable costs for producing books, papers, documents, electronically stored information, or tangible things.

25. Since The United States District Court, Northern District of Georgia, Atlanta Division failed/refused to serve a timely objection, The United States District Court, Northern District of Georgia, Atlanta Division has forever waived all objections to the subpoena. *Id.*

26. Since all objections have been waived "except the right to seek the reasonable costs for producing books, papers, documents, electronically stored information, or tangible things." This

Court's Order to Show Cause must be limited to discussing whether the reasonable costs of complying with said subpoena should be ordered. After said hearing, this Court should hold The United States District Court, Northern District of Georgia, Atlanta Division in contempt, award all attorney's fees and expenses associated with having to compel production of the Designated Items and issue an Order compelling production of the Designated Items instanter.

Respectfully submitted this 16th day of December, 2021.

**THE NEWMAN LAW FIRM**

/s/ Russell A. Newman  
Russell A. Newman, BPR No. 033462  
6688 Nolensville Road  
Suite 108-22  
Brentwood, TN 37027  
(615) 554-1510 (Telephone)  
(615) 283-3529 (Facsimile)  
E-mail:[russell@thenewmanlawfirm.com](mailto:russell@thenewmanlawfirm.com)  
*Attorney for Plaintiff Terpsehore Maras*

**In The Matter Of:**  
*Terpsehore Maras v.*  
*Chattanooga News Chronicle, et al.*

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*Chattanooga News Chronicle, et al.*  
*November 19, 2021*  
*Certificate of Non-Appearance*

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*Min-U-Script® with Word Index*

## **Certificate of Non-Appearance**

1

IN THE UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION

TERPSEHORE MARAS,  
Plaintiff,

vs. CASE NO. 21-C-1017

CHATTANOOGA NEWS CHRONICLE,  
et al,

Defendants.

REPORTER'S CERTIFICATE OF NON-APPEARANCE

ZOOM DEPOSITION OF:  
CHATTANOOGA NEWS CHRONICLE, et al.,

November 19, 2021,

1:53 p.m.

Fulton County Courthouse,  
Atlanta, Georgia 30303

Sharon R. Overman, CCR

WSG Reporting, LLC  
3430 Heartwood Lane  
Atlanta, Georgia 30340  
770.367.7822  
[office@WSGreporting.com](mailto:office@WSGreporting.com)

## Certificate of Non-Appearance

2

1 APPEARANCES OF COUNSEL

2 On behalf of the Plaintiff:

3 RUSSELL NEWMAN  
4 The Newman Law Firm  
5 Suite 108-22  
6 6688 Nolensville Road  
7 Brentwood, TN  
8 615.554.1510  
9 russell@thenewmanlawfirm.com

10 On behalf of the Defendants:

11 (no appearance)

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### EXHIBIT INDEX

#### Plaintiff's Exhibit

1	Hamilton County, Tennessee Subpoena	4
2	Fulton County Civil Subpoena for the Production of Evidence	4
3	Return of Service	4
4	Email to Kevin Weimer, 11-17-21	4

(End of Index)

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**Chattanooga News Chronicle, et al. - November 19, 2021  
Certificate of Non-Appearance**

4

(Reporter disclosure made pursuant to Article 10.B of the Rules and Regulations of the Board of Court Reporting of the Judicial Council of Georgia.)

5 \* \* \*

(Whereupon documents were identified as Plaintiff's Exhibit 1, 2, 3 and 4)

8 MR. NEWMAN: This is a case of  
9 Hamilton County Circuit Court for the 11th  
10 Judicial District at Chattanooga, Civil Action  
11 No. 21-C-1017.

12                                  The case was filed October 29, 2021,  
13 at 9:45 a.m. At the same time that the Verified  
14 Complaint was filed, the Hamilton County Circuit  
15 Court issued a Subpoena. The Subpoena is  
16 Exhibit 1 from the Hamilton County Circuit Court,  
17 and it is addressed to United States District  
18 Court for the Northern District of Georgia  
19 Atlanta Division, and the designated items to  
20 produce are all documents, reports, emails and/or  
21 other documents relating to J. Alex Halderman and  
22 The Halderman Report filed under seal.

23 The Subpoena was signed by the deputy  
24 clerk, and the Subpoena was issued October 29,  
25 2021.

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5

1                   On the same day, I traveled to the  
2 Fulton County Superior Court and domesticated  
3 that Subpoena. The domestication of that  
4 Subpoena is Exhibit 2. A Subpoena was addressed  
5 to the United States District Court, Northern  
6 District of Georgia Atlanta Division, and it  
7 required the production of the documents  
8 identified in the Tennessee Subpoena at the  
9 Fulton County Courthouse at 1:00 p.m. on the 19th  
10 day of November 2021.

11                  The superior court Subpoena  
12 identified the documents in the Tennessee  
13 Subpoena to be used as evidence by the Hamilton  
14 County Circuit Court in a case pending between  
15 Terpsehore, Chattanooga News Chronicle,  
16 Case No. 21-C-1017, and it, again, identified the  
17 documents in the Tennessee Subpoena.

18                  On October 29th, 2021, I went to the  
19 federal courthouse in Atlanta and went to the  
20 chambers of Federal Court Judge Amy Totenberg,  
21 requested that her clerk come out to take receipt  
22 of the documents. A clerk was dispatched by  
23 Judge Totenberg's office. Met the clerk in the  
24 lobby of the federal court clerk -- I believe  
25 it's the 23rd or 22nd floor -- and Judge

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**Chattanooga News Chronicle, et al. - November 19, 2021**  
**Certificate of Non-Appearance**

6

1 Totenberg's clerk took possession of the  
2 Subpoena, both the Subpoena from the Hamilton  
3 County Circuit Court and the Fulton County  
4 Superior Court Subpoena. Judge Totenberg's clerk  
5 took hand delivery and then returned to the  
6 office.

7                   The return on service is Exhibit 3,  
8 and it shows that the hand delivery to Judge Amy  
9 Totenberg's clerk was affected October 29, 2021,  
10 on the same day that both of these subpoenas were  
11 issued in the case was filed.

12                   On Wednesday, November 17th, 2021, at  
13 1713, 5:13 p.m., Kevin Weimer, signature says  
14 District Court Executive/Clerk of Court, sent an  
15 email, which I'm forwarding to you for Exhibit 4.  
16 The email says Subpoena from the Superior Court  
17 of Fulton County, and the email reads as follows:

18                   "Good afternoon, Mr. Newman, as I  
19 mentioned to you on the phone, the United States  
20 District Court for the Northern District of  
21 Georgia does not intend to respond the subpoena  
22 from the Superior Court of Fulton County  
23 pertaining to the case between Terpsehore Maras  
24 and Chattanooga News Chronicle, Regards, Kevin P.  
25 Weimer."

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**Chattanooga News Chronicle, et al. - November 19, 2021  
Certificate of Non-Appearance**

7

1                   I responded to Kevin's email today,  
2 November 19, 2021, at 12:39 Eastern standard  
3 time, and said:

4                   "Good afternoon, Mr. Weimer. Please  
5 meet me in the Fulton County Superior Court  
6 clerk's office so that we can be assigned a  
7 conference room for this deposition. I am  
8 running a few minutes late, but I will be there  
9 shortly after 1:00 p.m. See you soon."

10                  In response to this email which was  
11 sent at 12:39, Plaintiff has received no  
12 response. To date, as of 2:00 p.m., 2:01,  
13 Eastern standard time, we have no response. I  
14 went to the clerk's office in the Fulton County  
15 Superior Court, and there was no one there; no  
16 production of documents, no witness.

17                  That will conclude this deposition.

18                  (Statements adjourned, 2:01 p.m.)

19  
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**Chattanooga News Chronicle, et al. - November 19, 2021**  
**Certificate of Non-Appearance**

8

1           I, Sharon R. Overman, do hereby  
2 certify that I did appear at the above-referenced  
3 location on the above-referenced date and time  
4 for the taking of the deposition of the  
5 above-referenced witness;

6           That Russell Newman, attorney at law,  
7 was present for the Plaintiff.

8           That Mr. Newman and I remained in  
9 attendance and ready to take the above-referenced  
10 deposition until 2:01 p.m.;

11           That during that time, to the best of  
12 my knowledge, the deponent did not appear for the  
13 deposition, nor did the deponent contact the  
14 offices of the deposing counsel requesting  
15 additional time in order to arrive for the  
16 deposition;

17           That at 2:01 p.m. the deposition was  
18 adjourned;

19                         - - -

20           Mr. Newman made statements for the  
21 record.

22                         (Statement concluded at 2:01 p.m.)

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## Certificate of Non-Appearance

9

1 C E R T I F I C A T E

2 GEORGIA

3 FULTON COUNTY

4 I hereby certify that the above and  
5 foregoing pages 1 through 9  
6 are a true, complete, correct and exact  
7 transcript of my shorthand notes taken in  
8 the above-referenced matter;

9 That same constitutes a true,  
10 complete, correct and exact record of the  
11 above-referenced matter;

12 That same was transcribed through  
13 computer-assisted transcription;

14 That I am not of kin or counsel to  
15 any of the attorneys or parties, nor am I  
16 in the regular employ of any of the  
17 attorneys or parties;

18 This 23rd day of November, 2021.

19

20

21 

22

SHARON R. OVERMAN, B-2363  
Certified Court Reporter

23

24

25

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<b>A</b>	<p>5:15;6:24 <b>Circuit (5)</b> 4:9,14,16;5:14;6:3 <b>Civil (1)</b> 4:10 <b>clerk (8)</b> 4:24;5:21,22,23,24; 6:1,4,9 <b>clerk's (2)</b> 7:6,14 <b>Complaint (1)</b> 4:14 <b>conclude (1)</b> 7:17 <b>concluded (1)</b> 8:22 <b>conference (1)</b> 7:7 <b>contact (1)</b> 8:13 <b>Council (1)</b> 4:4 <b>counsel (1)</b> 8:14 <b>County (12)</b> 4:9,14,16;5:2,9,14; 6:3,3,17,22;7:5,14 <b>Court (20)</b> 4:3,9,15,16,18;5:2, 5,11,14,20,24;6:3,4, 14,14,16,20,22;7:5,15 <b>Courthouse (2)</b> 5:9,19</p>	<p>4:6,20,21;5:7,12,17, 22;7:16 <b>domesticated (1)</b> 5:2 <b>domestication (1)</b> 5:3 <b>during (1)</b> 8:11</p>	<p>4:6;5:8,12,16 <b>intend (1)</b> 6:21 <b>issued (3)</b> 4:15,24;6:11 <b>items (1)</b> 4:19</p>	<b>October (4)</b> 4:12,24;5:18;6:9 <b>office (4)</b> 5:23;6:7;6,14 <b>offices (1)</b> 8:14 <b>one (1)</b> 7:15 <b>order (1)</b> 8:15 <b>out (1)</b> 5:21 <b>Overman (1)</b> 8:1
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<b>G</b>			<p><b>I</b></p>	<b>M</b>
<b>H</b>			<p><b>J</b></p>	<b>N</b>
<b>I</b>			<p><b>K</b></p>	<b>O</b>
<b>J</b>			<p><b>L</b></p>	<b>P</b>
<b>K</b>			<p><b>M</b></p>	<b>R</b>
<b>L</b>			<p><b>N</b></p>	<b>S</b>
<b>M</b>			<p><b>O</b></p>	<b>T</b>
<b>N</b>			<p><b>P</b></p>	<b>U</b>
<b>O</b>			<p><b>Q</b></p>	<b>V</b>
<b>P</b>			<p><b>R</b></p>	<b>W</b>
<b>Q</b>			<p><b>S</b></p>	<b>X</b>
<b>R</b>			<p><b>T</b></p>	<b>Y</b>
<b>S</b>			<p><b>U</b></p>	<b>Z</b>
<b>T</b>			<p><b>V</b></p>	
<b>U</b>			<p><b>W</b></p>	
<b>V</b>			<p><b>X</b></p>	
<b>W</b>			<p><b>Y</b></p>	
<b>X</b>			<p><b>Z</b></p>	
<b>Y</b>			<p><b>A</b></p>	
<b>Z</b>			<p><b>B</b></p>	

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<b>IN THE CIRCUIT COURT FOR HAMILTON COUNTY, TENNESSEE</b>	<b>SUBPOENA</b> TENN. R. CIV. PRO. 45	CASE FILE NUMBER 21C1017
TO: (name, address & telephone number of witness) THE UNITED STATES DISTRICT COURT, FOR THE NORTHERN DISTRICT OF GEORGIA ATLANTA DIVISION, RICHARD B. RUSSELL FEDERAL BUILDING 2211 UNITED STATES COURTHOUSE, 75 TED TURNER DRIVE ATLANTA, GA 30303-3309 (404) 215-1600	PLAINTIFF(S) TERPSEHORE MARAS	DEFENDANT(S) CHATTANOOGA NEWS CHRONICLE ET AL.

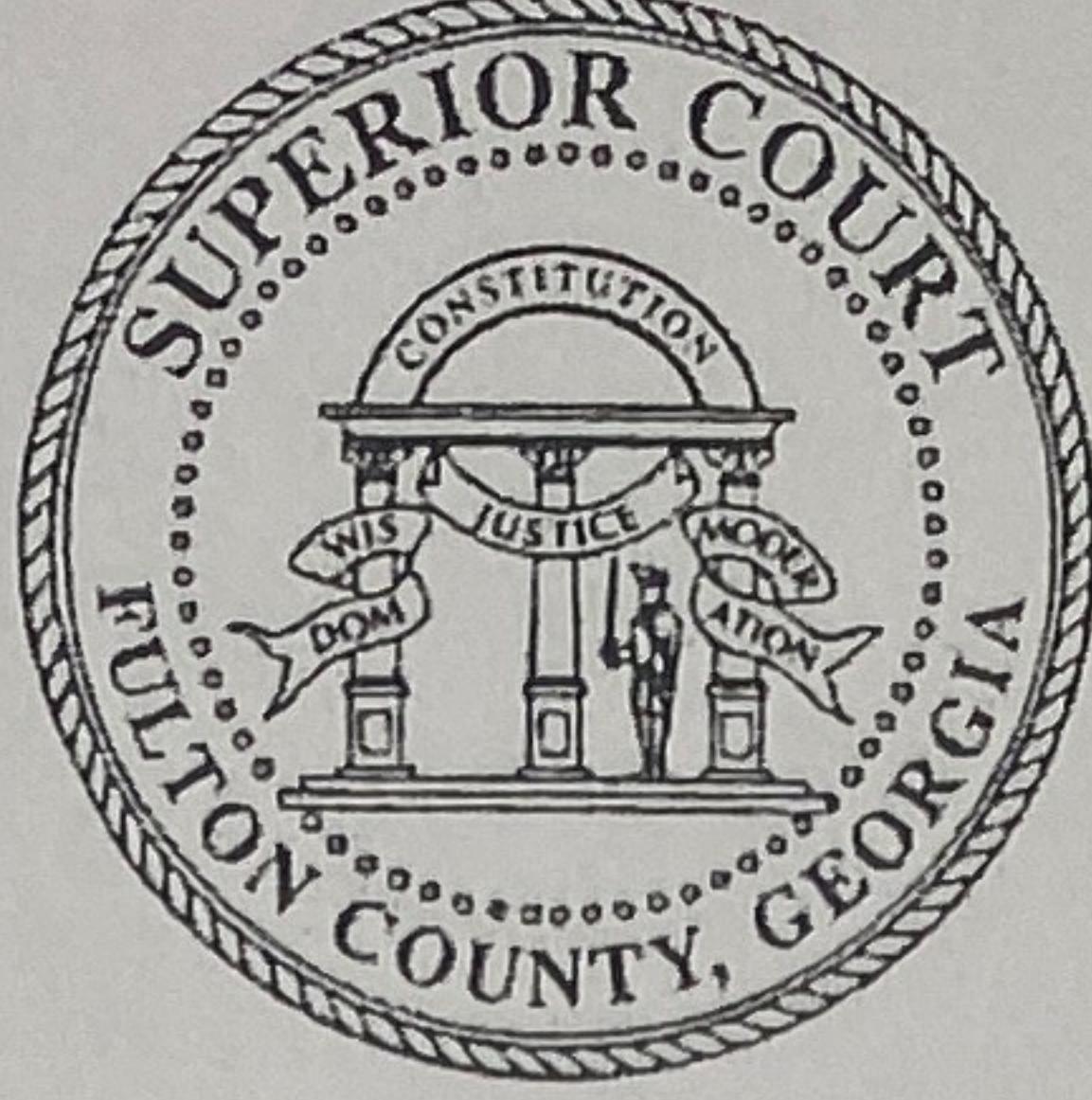
**✓ SUBPOENA FOR PRODUCTION OF DOCUMENTARY EVIDENCE, TENN.R.Civ.Pro. 45.02**

You are hereby commanded to produce and permit inspection and copying of designated items (books, papers, documents, or tangible things, or inspection of premises) at the time, date, and place specified herein. Your personal appearance is not required provided you sign a notarized affidavit that the books, papers, documents, or tangible things are authentic to the best of your knowledge, information, and belief and state whether or not all books, papers, documents, or tangible things responsive to this subpoena have been produced for copying or inspection. Copies of this subpoena have been duly served pursuant to Rule 5 on all parties, and all material produced will be made available for inspection or copying by all parties.

SUBPOENA FOR DEPOSITION, TENN.R.CIV.PRO. 45.04     SUBPOENA FOR HEARING OR TRIAL, TENN.R.CIV.PRO. 45.05  
You are hereby commanded to appear at the time, date, and place specified herein for the purpose of giving testimony. In addition, if indicated, you are to bring the designated items listed. Failure to appear may be punished by fine/imprisonment as provided by law.

Pursuant to TENN.R.CIV.PRO. 45.07(1), a party or attorney responsible for issuing and serving a subpoena shall provide the non-party witness at least twenty-one (21) days after service of the subpoena to respond, absent agreement of the non-party witness or a court order.

Date 19 November 2021	Time 1300	DESIGNATED ITEMS:  All documents, reports, e-mails and/or other documents relating to J. Alex Halderman and The Halderman Report filed under seal.
Place  <input type="checkbox"/> Other:		
This subpoena is issued on behalf of:  <input checked="" type="checkbox"/> PLAINTIFF <input type="checkbox"/> DEFENDANT Attorney or pro se: (name, address, & telephone number)		Issued: <u>29 OCTOBER 2021</u> , LARRY L. HENRY, CLERK DATE  CERTIFICATE OF SERVICE ATTACHED <u>  </u> YES <input checked="" type="checkbox"/> NO BY: <u>C. Smither</u> DEPUTY CLERK



CIVIL  
SUBPOENA FOR THE PRODUCTION OF EVIDENCE

STATE OF GEORGIA  
FULTON COUNTY

TO: USDC, ND of GA, ATLANTA DIVISION

You are hereby required to be at the Fulton County Superior Court before

, Judge of Superior Court,

in court room \_\_\_\_\_ of the Fulton County Courthouse at 1 o'clock a.m. p.m.

on the 19TH day of Nov, 20 21, and to bring  
DOCUMENTS IDENTIFIED IN  
THE TN SUBPOENA to be used as evidence

by HAMILTON COUNTY CIRCUIT COURT in a certain case pending in said court

between TERPSEHORE MARAS and CHATTANOOGA NEWS CHRONICLE  
ET AL.

Case number 21 C 1017.

The following are hereby subpoenaed: DOCUMENTS IDENTIFIED IN THE  
TN SUBPOENA.

HEREIN FAIL NOT, UNDER PENALTY OF LAW.

Witness, \_\_\_\_\_, Judge \_\_\_\_\_ of said court

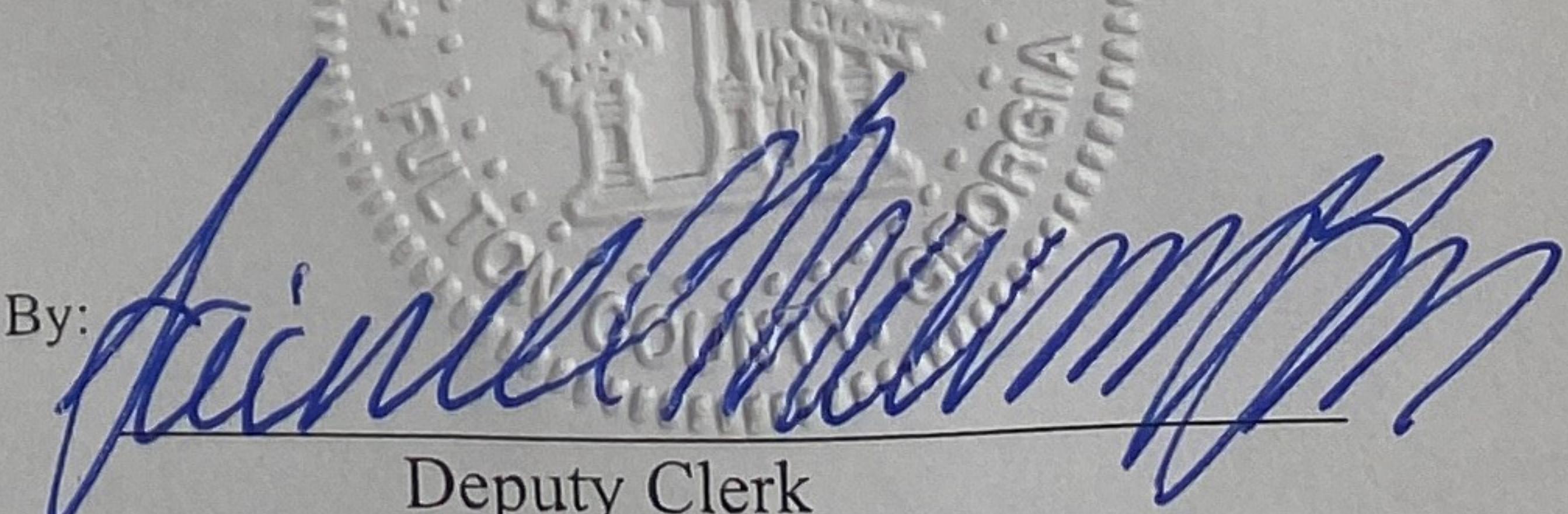
this \_\_\_\_\_ day of \_\_\_\_\_ 20 \_\_\_\_

If you have questions contact Attorney for  
Plaintiff/Defendant

Phone: \_\_\_\_\_

Honorable Cathelene "Tina" Robinson  
Clerk of Superior Court

By:

  
Deputy Clerk

EXHIBIT

2

<b>Service Return</b>	1 and 2 are for the return of an authorized officer or attorney; an attorney's return must be sworn to. 3 is for the witness who will acknowledge service and requires the witness's signature.
<input type="checkbox"/> 1. I certify that, on the date of service stated below, I served a copy of this subpoena on the witness by:	
<input type="checkbox"/> 2. I failed to serve a copy of this subpoena on the witness because:	
<input type="checkbox"/> 3. I acknowledge being served with this subpoena on the date of service stated below.	
<input type="checkbox"/> notary: My commission expires _____ <input type="checkbox"/> deputy clerk _____	Date _____
Sworn to and subscribed before me on _____  SEAL  Signature _____	Date of service: _____  Signature of Witness, Officer, or Attorney _____

Form 113, Rev 2019.10.16

**EXHIBIT**  
**3**

**From:** Russell Newman <[russell@thenewmanlawfirm.com](mailto:russell@thenewmanlawfirm.com)>  
**Date:** November 19, 2021 at 12:39:31 EST  
**To:** Kevin Weimer <[Kevin\\_Weimer@gand.uscourts.gov](mailto:Kevin_Weimer@gand.uscourts.gov)>  
**Subject:** Re: Subpoena from the Superior Court of Fulton County

Good afternoon, Mr. Weimer.

Please meet me in the Fulton County Superior Court Clerk's office so that we can be assigned a conference room for this deposition. I am running a few minutes late, but I will be there shortly after 1 pm.

See you soon,

Russell A. Newman, Esq.

The Newman Law Firm

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On Nov 17, 2021, at 17:13, Kevin Weimer <[Kevin\\_Weimer@gand.uscourts.gov](mailto:Kevin_Weimer@gand.uscourts.gov)> wrote:

Good afternoon, Mr. Newman. As I mentioned to you on the phone, the U.S. District Court for the Northern District of Georgia does not intend to respond to the subpoena from the Superior Court of Fulton County pertaining to the case between Terpsehore Maras and Chattanooga News Chronicle.

Regards,

Case 1:21-cv-00317-DCLC-CHS Document 33-4 Filed 01/28/22 Page 27 of 29 PageID #:  
2387  
Kevin P. Weimer

**EXHIBIT**  
**4**

**CERTIFICATE OF SERVICE**

I, Russell A. Newman, do hereby certify that I am counsel for Plaintiff Terpsehore Maras, in the above-captioned matter and that a copy of the **MOTION FOR SHOW CAUSE HEARING** was served to counselors of record or to the parties by mail, postage prepaid, as follows:

Michael R. O'Neill, Esq.  
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Keller, TX 76244

Kevin P. Weimer, Clerk  
The United States District Court  
Northern District of Georgia  
Atlanta Division  
75 Ted Turner Drive SW  
Atlanta, GA 30303

Respectfully submitted this 16th day of December, 2021.

**THE NEWMAN LAW FIRM**

By: /s/ Russell A. Newman  
Russell A. Newman, BPR # 033462